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DREW DESBORDES  
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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
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11 ASHLEY PARHAM, JANE DOE, and  
JOHN DOE,

12 Plaintiffs,  
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14 vs.

15 SEAN COMBS, KRISTINA  
KHORRAMN, SHANE PEARCE,  
RUBEN VALDEZ, JOHN  
16 PELLETIER, ODELL BECKHAM JR.,  
DREW DESBORDES, JACQUELYN  
17 WRIGHT, HELENA HARRIS-SCOTT,  
MATIAS GONZALEZ, BRANDI  
18 CUNNINGHAM, JANICE COMBS,  
KEITH LUCKS, and JOHN AND  
19 JANE DOES 1-10,

20 Defendants.  
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Case No. 3:24-CV-07191-RFL

Assigned to Hon. Rita F. Lin

**DECLARATION OF DAVID  
GROSSMAN IN SUPPORT OF  
DESBORDES ADMINISTRATIVE  
MOTION TO SEAL**

Complaint Filed: 10/15/24

**DECLARATION OF DAVID GROSSMAN**

I, David Grossman, declare:

1. I am an attorney at law, licensed to practice before all Courts of the State of California and before this Court. I am a partner at the law firm of Loeb & Loeb LLP (“Loeb”) and have been retained by Defendant Drew Desbordes in connection with the above-captioned action. I make this Declaration in support of Defendant’s Administrative Motion to Seal.

2. On May 5, 2025, counsel for Plaintiffs was contacted by email regarding this anticipated administrative motion seeking a stipulation. Plaintiffs’ counsels’ replies to the correspondence did not respond to the stipulation request, accordingly a stipulation could not be obtained. *See* Civ. L.R. 7-11(a).

3. Mr. Desbordes is a public figure.

4. Plaintiffs claims’, including the claims against Mr. Desbordes, have been the subject of considerable media attention. Counsel for Plaintiffs has appeared on various programs discussing the allegations.

5. The materials sought to be redacted from the exhibits to Mr. Desbordes’ declaration in support of the motion for Rule 11 sanctions includes personally identifiable information along with other sensitive information related to Mr. Desbordes, including financial account numbers, Mr. Desbordes’ current personal telephone number, and physical addresses associated with Mr. Desbordes. They also include the names and telephone numbers of third parties not associated with this case.

6. Mr. Desbordes, as well as the third parties, have a privacy interest in the information sought to be redacted.

7. Mr. Desbordes also has an interest in protecting himself from financial and physical crime. The publication of personally identifiable information, phone

1 numbers, account numbers, or addresses could place Mr. Desbordes (or the third  
2 parties) at heightened risk of such crime.

3 8. There have been many reports in recent years of public figures,  
4 including influencers like Mr. Desbordes, being targeted as crime victims. For  
5 example, in March of this year it was widely reported that two separate influencers  
6 were the victims of home invasions and attempted robbery.

7 9. A true and correct copy of **Exhibit 1** to Mr. Desbordes' Declaration in  
8 support of the motion for Rule 11 sanctions with the proposed redactions  
9 highlighted is attached to this declaration and filed under seal.

10 10. A true and correct copy of **Exhibit 5** to Mr. Desbordes' Declaration in  
11 support of the motion for Rule 11 sanctions with the proposed redactions  
12 highlighted is attached to this declaration and filed under seal.

13 11. A true and correct copy of **Exhibit 6** to Mr. Desbordes' Declaration in  
14 support of the motion for Rule 11 sanctions with the proposed redactions  
15 highlighted is attached to this declaration and filed under seal.

16 12. A true and correct copy of **Exhibit 10** to Mr. Desbordes' Declaration in  
17 support of the motion for Rule 11 sanctions with the proposed redactions  
18 highlighted is attached to this declaration and filed under seal.

19 13. A true and correct copy of **Exhibit 11** to Mr. Desbordes' Declaration in  
20 support of the motion for Rule 11 sanctions with the proposed redactions  
21 highlighted is attached to this declaration and filed under seal.

22 I declare under penalty of perjury under the laws of the United States of  
23 America that the foregoing is true and correct.

24 Executed on May 5, 2025, at Los Angeles, California.

25  
26 /s/ David Grossman  
David Grossman